

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSE OF UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF  
ADVO, INC.  
(ADVO/USPS-5 AND 19)

The United States Postal Service hereby provides responses to the following interrogatories of Advo, Inc.: ADVO/USPS-5 and 19, filed on September 15, 1997. A motion for extension of time to file these responses was filed on September 29, 1997.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Chief Counsel, Ratemaking

  
Anne B. Reynolds

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October 3, 1997

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF ADVO

ADVO/USPS-5. For FY 94, 95 and 96, please provide the following for each city carrier route type:

- a. Average number of possible deliveries.
- b. Average daily volume per route or delivery.

RESPONSE:

- a. Shown below are estimated numbers of possible deliveries by route type, obtained from the Carrier Cost System.

Route Type	<u>FY 94</u>	<u>FY 95</u>	<u>FY 96</u>
1500	357,347	377,210	389,749
1502	433,635	429,990	440,783
1506			4,739
1540	9,035,104	9,100,694	8,750,385
1551	18,911	18,321	6,288
1552	85,199	100,173	113,044
1557	381,092	409,123	418,387
1560	46,530,041	46,053,132	45,572,650
1562	15,266,243	14,892,131	14,707,944
1571	1,607,789	1,430,586	1,616,146
1573	757,204	778,400	728,379
1575	50,296	32,970	41,926
1620	318,887	330,350	335,148
1640	2,720,497	2,791,006	2,805,940
1642	329,597	341,623	364,000
1720			12,242
1730	61,030	64,836	50,651
1740	3,253		
1770	232,479	195,721	229,332

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ADVO/USPS-5 (con't).

b. Shown below are estimated average daily volume per delivery by route type,  
obtained from Carrier Cost System.

<u>Route</u> <u>Type</u>	<u>FY 94</u>	<u>FY 95</u>	<u>FY 96</u>
1500	9.0	8.5	9.5
1502	9.7	8.6	7.7
1506			3.9
1540	3.7	3.7	3.5
1551	3.1	2.4	2.9
1552	6.6	4.7	3.5
1557	4.3	4.6	4.6
1560	4.1	4.1	4.1
1562	4.9	5.0	5.0
1571	4.3	3.6	4.2
1573	3.2	3.1	3.4
1575	8.4	6.0	6.5
1620	4.4	4.9	4.9
1640	6.0	6.6	6.6
1642	5.3	5.2	5.3
1720			14.5
1730	10.7	8.6	8.0
1740	6.5		
1770	1.5	1.9	2.0

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ADVO/USPS-19. LR-H-197, p. 2, states that the rural mail count and the rural carrier cost system (CCS) do not count flats in exactly the same way. Please explain fully how each of the following is counted in the rural mail count and explain fully why its CCS volume must be adjusted:

- (a) Flats.
- (b) Letters.


RESPONSE:

This information is discussed fully in Docket No. R90-1, USPS-T-13,

Appendix F, pages F24-F29.

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Anne B. Reynolds

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